



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

224 South Arthur • Pocatello, Idaho 83204-3202 • (208) 236-6160

Dirk Kempthorne, Governor
C. Stephen Allred, Director

August 7, 2000

CERTIFIED MAIL # P 562 927 214

John Hatfield
Soda Springs Phosphate, Incorporated
720 East Industrial Place
Soda Springs, Idaho 83276

RE: T2-000004, Soda Springs Phosphate, Incorporated
Final Tier II Operating Permit No. # 029-00008, Granulation of Phosphate Ore and Gypsum

Dear Mr. Hatfield:

On February 25, 2000, the Idaho Department of Environmental Quality (DEQ) received an application for a Tier II Operating Permit (OP) from Soda Springs Phosphate, Incorporated. On March 24, 2000, the application was declared complete.

On June 22, 2000, a proposed Tier II OP was issued for public comment. The public comment period closed on July 24, 2000. During the comment period, DEQ received comments about the content of the proposed OP. These comments were addressed by DEQ in the response package.

Based on review of your application, state and federal rules and regulations, and comments received, DEQ finds this project meets the provisions of IDAPA 58.01.01.400 (*Rules for the Control of Air Pollution in Idaho*). Therefore, enclosed is the final Tier II OP # 029-00008 for the emissions that exist at your facility.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, Idaho, 83706, within thirty-five (35) days of the date of this decision.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Richard Elkins of the Pocatello Regional Office, at (208) 236-6160.

Sincerely,

Mark Dietrich
Acting Regional Administrator
Pocatello Regional Office

Enclosure

cc: ~~Marilyn Seymore~~ DEQ State Office
Pocatello Regional Office
L. Kral, EPA - Region 10

STATE OF IDAHO AIR POLLUTION OPERATING PERMIT GENERAL INFORMATION	PERMIT NUMBER 0 2 9 - 0 0 0 0 8		
	AQCR 0 6 1	CLASS S M	SIC 2 8 1 9
	ZONE 1 1	UTM COORDINATE (km) 4 5 2 . 3 . 4 7 2 4 . 8	
1. PERMITTEE Soda Springs Phosphate, Incorporated			
2. PROJECT Tier II Revised Operating Permit			
3. MAILING ADDRESS 720 East Industrial Place		TELEPHONE # (208) 547-3494	COUNTY Caribou
4. CITY Soda Springs		STATE Idaho	ZIP CODE 83276
5. PERSON TO CONTACT John Hatfield		TITLE President	
6. EXACT PLANT LOCATION 720 East Industrial Place, North Side of Soda Springs, Idaho			
7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS Granulation of Phosphate Ore and Gypsum for Organic Farming Application			
8. PERMIT AUTHORITY This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 58.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit. THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND DEPARTMENT OF ENVIRONMENTAL QUALITY'S (DEQ) TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEQ REVIEW IN ACCORDANCE WITH SECTION 58.01.01.200 OF THE RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO.			
 ADMINISTRATOR, POCATELLO REGIONAL OFFICE DEPARTMENT OF ENVIRONMENTAL QUALITY		ISSUED DATE August 21, 2000	
		EXPIRATION DATE August 21, 2005	

**AIR POLLUTION OPERATING PERMIT
 PERMITTEE, PROJECT, AND LOCATION**

Soda Springs Phosphate, Incorporated
 Tier II Revised Operating Permit
 Soda Springs, Idaho

PERMIT NUMBER

0 2 9 - 0 0 0 0 8

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Dryer/Cooler Scrubber Stack

1. EMISSIONS LIMITS

- 1.1 Particulate matter (PM) with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM-10), sulfur dioxide (SO₂), oxides of nitrogen (NO_x), carbon monoxide (CO), and volatile organic compound (VOC) emissions from the Scrubber Stack shall not exceed the corresponding emissions limits listed in Appendix A of this permit.
- 1.2 Visible emissions from the Scrubber Stack shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as required by IDAPA 58.01.01.625 (Rules for the Control of Air Pollution in Idaho).
- 1.3 Visible fugitive emissions from the pug mill and the granulator shall not be observed leaving the property boundary exceeding a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. This visual determination is to be conducted using Method 22, as described in 40 CFR Part 60, Appendix A.
- 1.4 The Permittee shall not allow, suffer, cause or permit the emission of odorous gases, liquids or solids into the atmosphere in such quantities as to cause air pollution, as required in IDAPA 58.01.01.776.01.

2. OPERATING REQUIREMENTS
2.1 Feed Material Throughput

The fertilizer feed material to the facility shall not exceed a maximum of eighteen tons per hour (18 T/hr) of feed material.

2.2 Control System

The two (2) dry cyclones, the wet cyclonic scrubber and the three (3) stage wet scrubber, shall be connected in series. The control equipment shall be operated at all times while the facility is operating.

2.2.1 Wet Scrubber

2.2.1.1 Pressure drop across the wet scrubber shall be maintained within the limits recorded during the most recent source test which demonstrates compliance with the limits listed in Appendix A of this permit.

2.2.2.1 Water flowrate to the wet scrubbers shall be greater than or equal to the flowrate recorded during the most recent source test, which demonstrates compliance with the limits listed in Appendix A of this permit.

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SOURCE

Dryer/Cooler Scrubber Stack

2.3 Dryer Temperature

The temperature of the dryer shall not exceed the temperature recorded during the most recent source test, which demonstrates compliance with the limits listed in Appendix A of this permit.

2.4 Installation of Monitoring Equipment

The Permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure differential across the air pollution control equipment, the scrubbing media flowrate to the wet scrubber system, and the temperature of the dryer.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 The following parameters shall be recorded on a daily basis and during any visible emissions evaluations performed in accordance with Section 3.4 of this permit. All data shall be kept on-site, in a log, for a period of two (2) years and made available to DEQ representatives upon request.

3.1.1 Pressure drop across the wet scrubber system.

3.1.2 Scrubbing media flowrate to the wet scrubber system.

3.1.3 Amount of fresh water flowrate to the wet scrubber system.

3.1.4 The temperature of the dryer.

3.1.5 For each of the above, documentation shall be kept on-site, in a log, for a period of two (2) years and made available to DEQ representatives upon request.

3.2 The fertilizer feed material of the facility shall be monitored and recorded on an hourly basis.

3.3 Monthly visible emission evaluations shall be performed on the scrubber stack and recorded by a certified opacity reader following the procedures outlined in IDAPA.58.01.01.625 (Rules for the Control of Air Pollution in Idaho). All data shall be kept on-site, in a log, for a period of two (2) years and made available to DEQ representatives upon request.

3.4 Performance Test

Prior to July 31 of each calendar year, the Permittee shall conduct an annual performance test on the scrubber stack to demonstrate compliance with the PM limits listed in Appendix A and all other requirements of this permit. The performance test shall be performed at the maximum feed rate of the process and in accordance with Section 157. Visible emissions shall be observed and recorded concurrently with the emission test. In addition, visible emission determinations shall be performed

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SOURCE

Dryer/Cooler Scrubber Stack

at the property boundary. The pressure drop across the wet scrubber system, scrubbing media flowrate, fresh water flowrate, dryer temperature, and fertilizer throughput shall be continuously monitored and recorded during the emission test in order to set the parameters required in Section 2 of this permit.

The Permittee is strongly encouraged submit a protocol for the performance test to DEQ for approval at least thirty (30) days prior to the test date.

The Permittee shall submit a written report of the performance test to DEQ within thirty (30) days after performing the test.

3.5 Odor Control

The permittee shall maintain a log of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The log shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

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SOURCE

Product Screening, Conveying, and Milling

1. EMISSION LIMITS

- 1.1 Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM-10) emissions from Product Screening, Conveying, and Milling shall not exceed the corresponding emissions limits listed in Appendix A of this permit.
- 1.2 Visible emissions from the Product Screening, Conveying, and Milling shall not be observed leaving the property boundary exceeding a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. This visual determination is to be conducted using Method 22, as described in 40 CFR Part 60, Appendix A.

2. OPERATING REQUIREMENTS

- 2.1 Emissions generated from the Product Screening, Conveying, and Milling shall be reasonably controlled in accordance with IDAPA 58.01.01.650 (Rules for the Control of Air Pollution in Idaho).

Some of the efficient and reasonable controls may include, but shall not be limited to, the following:

- 2.1.1 Use of water or environmentally safe chemicals;
- 2.1.2 Application of dust suppressants; and
- 2.1.3 Use of control equipment.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

- 3.1 The following parameters shall be recorded and kept on-site. Any changes shall be recorded in a log and kept on-site for a period of two (2) years and made available to DEQ representatives upon request.
 - 3.1.1 Brand name and chemical composition of the dust suppressant used.
 - 3.1.2 Dilution ratio (volume of water: volume of dust suppressant) used.
 - 3.1.3 Application intensity (gal/day) of the dust suppressant solution.
 - 3.1.4 Facility plot plan illustrating the treated areas.
- 3.2 The Permittee shall add a column to their daily audit log and record the number of dust suppressant applications on a daily basis. All data shall be kept on-site for a period of two (2) years and made available to Department representatives upon request.

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SOURCE

Ore Unloading, Ore Piling, Stockpiles, and Ore Feeding

1. EMISSION LIMITS

- 1.1 Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM-10) emissions from Ore Unloading, Ore Piling, Stockpiles, and Ore Feeding shall not exceed the corresponding emissions limits listed in Appendix B of this permit.
- 1.2 Visible fugitive emissions from Ore Unloading, Ore Piling, Stockpiles, and Ore Feeding shall not be observed leaving the property boundary exceeding a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. This visual determination is to be conducted using Method 22, as described in 40 CFR Part 60, Appendix A.

2. OPERATING REQUIREMENTS

- 2.1 Fugitive emissions generated from Ore Unloading, Ore Piling, Stockpiles, and Ore Feeding shall be reasonably controlled in accordance with IDAPA 58.01.01.650 (Rules for the Control of Air Pollution in Idaho).

Some of the efficient and reasonable controls may include, but shall not be limited to, the following:

- 2.1.1 Use of water or environmentally safe chemicals;
- 2.1.2 Application of dust suppressants; and
- 2.1.3 Use of control equipment.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

- 3.1 The following parameters shall be recorded and kept on-site. Any changes shall be recorded in a log and kept on-site for a period of two (2) years and made available to DEQ representatives upon request.
 - 3.1.1 Brand name and chemical composition of the dust suppressant used.
 - 3.1.2 Dilution ratio (volume of water: volume of dust suppressant) used.
 - 3.1.3 Application intensity (gal/day) of the dust suppressant solution.
 - 3.1.4 Facility plot plan illustrating the treated areas.

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SOURCE

Ore Unloading, Ore Piling, Stockpiles, and Ore Feeding

- 3.2 The Permittee shall add a column to their daily audit log and record the number of dust suppressant applications on a daily basis. All data shall be kept on-site for a period of two (2) years and made available to Department representatives upon request.

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Product Loading

1. EMISSION LIMITS

- 1.1 Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM-10) emissions from the Product Loading operation shall not exceed the corresponding emissions limits listed in Appendix B of this permit.
- 1.2 Visible fugitive emissions from the Product Loading operation shall not be observed leaving the property boundary exceeding a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. This visual determination is to be conducted using Method 22, as described in 40 CFR Part 60, Appendix A.

2. OPERATING REQUIREMENTS

- 2.1 Fugitive emissions generated from Product Loading shall be reasonably controlled in accordance with IDAPA 58.01.01.650 (Rules for the Control of Air Pollution in Idaho).

Some of the efficient and reasonable controls may include, but shall not be limited to, the following:

- 2.1.1 Use of water or environmentally safe chemicals;
- 2.1.2 Application of dust suppressants;
- 2.1.3 Use of control equipment; and
- 2.1.4 Covering of trucks.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

- 3.1 The following parameters shall be recorded and kept on-site. Any changes shall be recorded in a log and kept on-site for a period of two (2) years and made available to DEQ representatives upon request.
- 3.1.1 Brand name and chemical composition of the dust suppressant used.
- 3.1.2 Dilution ratio (volume of water: volume of dust suppressant) used.
- 3.1.3 Application intensity (gal/day) of the dust suppressant solution.
- 3.1.4 Facility plot plan illustrating the treated areas.

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Product Loading

- 3.2 The Permittee shall add a column to their daily audit log and record the number of dust suppressant applications on a daily basis. All data shall be kept on-site for a period of two (2) years and made available to Department representatives upon request.

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SOURCE

Appendix A

Appendix A

Soda Springs Phosphate, Incorporated - Soda Springs

Hourly (lb/hr) and Annual (T/yr) Point Source Emissions Limits^a

Source	PM		PM-10	
	lb/hr	T/yr	lb/hr	T/yr
Scrubber Stack	7.00	30.7	7.00	30.7
Screening, Conveying, Milling	2.44	10.7	0.93	4.07

- a. As determined by a pollutant specific U.S. EPA reference method, DEQ approved alternative, or as determined by DEQ's emission estimation methods used in the permit application analysis.

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SOURCE

Appendix B

Appendix B
Soda Springs Phosphate, Incorporated - Soda Springs
Hourly (lb/hr) and Annual (T/yr) Area Source Emissions Limits*

Source	PM		PM-10	
	lb/hr	T/yr	lb/hr	T/yr
Ore Unloading, Piling, Stockpiles, Feeding	—	1.75	—	0.72
Product Loading	—	2.58	—	0.94

- a. As determined by a pollutant specific U.S. EPA reference method, DEQ approved alternative, or as determined by the DEQ's emission estimation methods used in the permit application analysis.

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TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures to be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e.; air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior DEQ approval.
- The Permittee shall submit a proposed test date for each performance test required by this permit to DEQ for approval at least fifteen (15) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The Permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.
- Within thirty (30) days of the date on which a performance test required by this permit is concluded, the Permittee shall submit to DEQ a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.
- The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by DEQ, which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.
- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

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